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Attorneys for Defendants
EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., and FULLERTON
ORTHOPAEDIC SURGERY MEDICAL GROUP, INC.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:)

Jeffries, et al. v. Ameridose, et al.)
Docket No. 1:14-cv-12789-RWZ)

**STIPULATION TO FURTHER EXTEND TIME FOR DEFENDANTS,
EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., AND
FULLERTON ORTHOPAEDIC SURGERY MEDICAL GROUP, INC.,
TO RESPOND TO PLAINTIFFS' COMPLAINT AND
TO STAY DISCOVERY BETWEEN THE PARTIES**

IT IS HEREBY STIPULATED between Plaintiffs, JOHN EDWARDS JEFFRIES, by and through his SUCCESSOR IN INTEREST CLAY C. JEFFRIES, and CLAY C. JEFFRIES, CYNTHIA A. CARDEY, PARTRICK J. JEFFRIES, WYNEMA K. HYNDMAN, JOHN E. JEFFRIES, JR. and REED JEFFRIES, individually, by and through their counsel of record, and Defendants, EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., and FULLERTON ORTHOPAEDIC SURGERY MEDICAL GROUP, INC., through their counsel of record, as follows:

1. That, in light of the parties' ongoing discussions regarding submission of this matter to binding arbitration, the time in which Defendants may respond to Plaintiffs' Complaint, either by Answer or otherwise, is hereby extended until January 16, 2015. This will not act as a waiver of arbitration on behalf of any of the parties.
2. The parties agree to stay, for the time being, the date that their respective initial disclosures pursuant to Federal Rules of Civil Procedure, Rule 26, must be served.
3. Any of the above parties may terminate this stay on initial disclosures at any time by serving a written demand for initial disclosures on the opposing parties.
4. In the event any of the above parties serves a written demand for initial disclosures, all parties (including the party issuing the demand) must serve initial disclosures pursuant to Rule 26 within 28 days of service of the written demand.
5. Each of the parties to this stipulation further agrees to withhold propounding discovery on any of the other parties to this stipulation until after such time as the party's own initial disclosures are served.
6. The parties agree that the stipulated stay regarding discovery does not affect or apply to any Defendant Fact Sheet entered by this Court. If and when a Defendant Fact Sheet is entered by this Court, the parties shall confer and agree upon Defendants' obligations regarding the completion of said Defendant Fact Sheet.
7. The parties agree that any response to a Defendant Fact Sheet or any other discovery in this matter will not act as a waiver of arbitration on behalf of any of the parties. The parties further agree that, should the matter subsequently enter arbitration, previously serving or filing a Defendant Fact Sheet or any response thereto will have no effect on the limited jurisdiction maintained by the Court during the pendency of the arbitration proceedings pursuant to the Federal Arbitration Act (9 U.S.C. § 1, et seq.) and the California Arbitration Act (Cal. Code Civ. Proc. § 1280, et seq.).

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8. The parties agree that submission of this matter to arbitration shall not constitute a waiver of or consent to the jurisdiction of the above-captioned Court by any party to this stipulation.

IT IS SO STIPULATED.

Dated: November 20, 2014

JANET, JENER & SUGGS, LLC



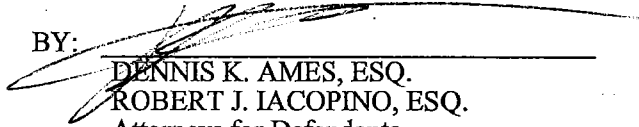
BY: _____

ROBERT K. JENNER, ESQ.
KIMBERLY A. DOUGHERTY, ESQ.
Attorneys for Plaintiffs,
CLAY C. JEFFRIES, individually and as
successor in interest for John Edward Jeffries,
CYNTHIA A. CARDEY, PATRICK J.
JEFFRIES, WYNEMA K. HYNDMAN, JOHN
E. JEFFRIES, JR., AND REED JEFFRIES

Dated: November 20, 2014

LA FOLLETTE, JOHNSON, DEHAAS, FESLER & AMES

BY: _____



DENNIS K. AMES, ESQ.
ROBERT J. IACOPINO, ESQ.
Attorneys for Defendants
EUGEN D. WILLIAMS, M.D.,
LINDA LUI LUONG, P.A., and
FULLERTON ORTHOPAEDIC
SURGERY MEDICAL GROUP, INC.

CERTIFICATE OF SERVICE

I, the undersigned, am employed in the County of Orange, State of California. I am over the age of eighteen years and not a party to the within action. I am employed with the law offices of La Follette, Johnson, De Haas, Fesler & Ames, 2677 N. Main Street, Suite 901, Santa Ana, California 92705.

On the below date, I electronically served a true and correct copy of the document entitled **STIPULATION TO FURTHER EXTEND TIME FOR DEFENDANTS, EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., AND FULLERTON ORTHOPAEDIC SURGERY MEDICAL GROUP, INC., TO RESPOND TO PLAINTIFFS' COMPLAINT AND TO STAY DISCOVERY BETWEEN THE PARTIES** on all parties in MDL No. 2419 via CM/ECF. I also served a true and correct copy of this document by United States mail on the following parties:

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I declare that I am employed in the office of an attorney admitted to practice before this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 20, 2014, at Santa Ana, California.


MONICA SALT